

EXHIBIT 8

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

PLAINTIFF,

CASE NO.

VS.

3:17-CV-00939-WHA

UBER TECHNOLOGIES, INC.,

OTTOMOTTO LLC; OTTO

TRUCKING LLC,

DEFENDANTS.

CONFIDENTIAL

VIDEOTAPED DEPOSITION OF RHIAN MORGAN

SAN FRANCISCO, CALIFORNIA

FRIDAY, APRIL 14, 2017

VOLUME I

Reported By:

MEGAN F. ALVAREZ, RPR, CSR No. 12470

Job No. 2594028

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1 BY MS. COOPER:

2 Q. Were you involved in a due diligence
3 investigation in the spring of 2016?

4 A. No.

5 Q. Have you ever heard of such an
6 investigation?

7 A. No.

8 Q. You've never heard of a due diligence
9 investigation conducted by Uber in the spring of
10 2016?

11 MR. TATE: Objection. Form.

12 BY MS. COOPER:

13 Q. Is that correct?

14 A. I remember there being some interviews
15 that happened for some of our early employees. I'm
16 not sure if that counts under due diligence or -- or
17 not.

18 Q. Who was conducting the interview?

19 MR. TATE: I'm going to object on the
20 basis of attorney-client privilege, joint defense,
21 common interest.

22 And instruct the witness not to answer any
23 further questions regarding any due diligence that
24 you're talking about.

25 ///

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CERTIFICATE OF REPORTER

I, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were administered an oath; that a verbatim record of the proceedings was made by me using machine shorthand, which was thereafter transcribed under my direction; and that the foregoing is an accurate transcription thereof.

Further, that if the foregoing pertains to the original transcript of a deposition in a federal case, before completion of the proceedings, review of the transcript [] was [X] was not requested.

I further certify that I am neither financially interested in the action, nor a relative or employee of any attorney of any party to this action.

IN WITNESS WHEREOF, I have this date subscribed my name.

DATED: 4/14,



MEGAN F. ALVAREZ

CSR No. 12470, RPR